

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) JOHN FIDLER,
(2) DANIEL REDMOND,
(3) ROBERT CAFARELLI,
(4) MICHAEL ROSS
(5) MARK HARRINGTON

Defendants.

Criminal No. 15-10300-DPW

JOINT MEMORANDUM FOR STATUS REPORT

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(a).¹

1. Status of Automatic Discovery and Any Pending Discovery Request

On October 28, 2014, and thereafter, the government produced automatic discovery as required under the Local Rules.

2. The Timing of Any Additional Discovery to be Produced

The government will continue to make any further pre-trial disclosures as are required by law.

3. The Timing of Any Additional Discovery Requests

There are no pending discovery requests but the defendants expect to file another motion for discovery.

¹ Counsel for defendants have indicated their agreement to this joint memorandum.

4. Protective Orders

The Court endorsed a Protective Order on October 23, 2015. See Docket No. 43.

5. The Timing of Pretrial Motions

The defendants have filed a motion to dismiss which the Court has taken under advisement and has not yet notified the Court about any further substantive motions they plan to file.

6. The Timing of Expert Witness Disclosures

The defendants request expert discovery pursuant to Fed. R. Crim. P. 16(a)(1)(G) and the parties request that the Court order that such discovery be produced no later than 60 days prior to trial in this matter, with reciprocal discovery to be produced no later than 30 days before trial.

7. Excludable delay

The parties jointly ask the Court to exclude the time from May 3, 2016 until the date of the next status conference, under 18 U.S.C. § 3161(h)(7)(A), because the parties have needed the time to review discovery in this case. The ends of justice served by this exclusion outweigh the interests of the public and the defendants in a speedy trial.

8. Interim/Final status conference

The parties ask the Court to schedule another status conference in approximately 45 days.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/Laura J. Kaplan
Laura J. Kaplan
Kristina E. Barclay
Assistant U.S. Attorneys

ROBERT CAFARELLIE
By his attorneys,

/s/ Carmen Lepore
Carmen Lepore, Esq.
15 Sprague Street
Revere, MA 02151.

MARK HARRINGTON
By his attorneys,

/s/ Robert Goldstein
Robert Goldstein, Esq.
20 Park Plaza
Suite 1000
Boston, MA 02116

MICHAEL ROSS
By his attorneys,

/s/ Kevin Barron
Kevin Barron, Esq.
15 Broad Street
Suite 240
Boston, MA 02109

JOHN FIDLER
By his attorneys,

/s/ Timothy P. O'Connell
Timothy P. O'Connell, Esq.
2 Shipway Pl.
Boston, MA 02129

DANIEL REDMOND
By his attorneys,

/s/ Oscar Cruz, Esq.
Oscar Cruz, Esq.
Assistant Federal Public Defender
Federal Public Defender's Office
Boston, MA 02110